

### PROFFER OF FACTS

Had this case gone to trial, the Government's evidence would have shown beyond a reasonable doubt in *United States v. Jonathan Fullard*, 2012CF14519, that the defendant committed Second Degree Murder.

Specifically:

On or about March 4, 2012, the defendant Jonathan Fullard, aka Jonathan Mason, while his then girlfriend went to work, babysat her 20-month-old son, Keyontae Osbia Moore, at [REDACTED] 30<sup>th</sup> Street, Southeast, in the District of Columbia. At about 3:00 a.m., Fullard called his then girlfriend and stated that the toddler had stopped breathing. Keyontae was initially taken to United Medical Center, and was later transferred to Children's National Medical Center, where physicians found trauma to his head, and body. The child died on March 5, 2012 from multiple blunt force trauma.

The District of Columbia Medical Examiner, Dr. Sunil Prashar ruled the case a homicide and found the cause of death to be blunt force trauma. The baby suffered a subdural hemorrhage, as well as contusions (or bruises) to the right side of the forehead, the mid upper forehead, left side of the forehead, left temporal region of the head, right upper and mid cheek, the jaw, the left upper eyelid, chin, mouth, and chest. There were petechial hemorrhages to the child's mid and left lower back, as well as a hemorrhage, acute inflammation and necrosis to the left kidney. The child had bruising to the lower back and legs. The child had "edema and erythema" of the foreskin of the penis and the scrotum. There was bruising to the scrotal sac, as well as, the child's anus and rectum. There were lacerations to the child's anus. The child also suffered two left rib fractures.

The evidence indicates that Jonathan Fullard was the only person caring for the child at the time of the child's injuries. The defendant admitted that he was "play boxing" with the decedent. He admitted that he struck the decedent with closed fists in his upper-torso five to six times. The defendant also admitted that on a prior incident, that while changing the decedent's diaper, his finger inadvertently slid into the decedent's rectum. Initially, when questioned by the Metropolitan Police Department, the defendant provided a false name of Jonathan Mason and was released. After the child's death, Fullard's true name was discovered and he was subsequently arrested on March 12, 2012.

**DEFENDANT'S ACKNOWLEDGEMENT**

I have read and discussed the Government's Proffer of Facts with my attorney, Anthony Matthews. I acknowledge by my signature that if presented at trial, the government's evidence, consistent with the facts set forth above in the Proffer of Facts, would be sufficient to prove beyond a reasonable doubt that I committed the offense of Second Degree Murder.

Date: 10/2/12

Jonathan Fullard  
**JONATHAN FULLARD**  
**DEFENDANT**

Date: 10/2/12

Anthony W. Matthews  
**ANTHONY MATTHEWS**  
**Attorney for DEFENDANT**